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June 15, 2000

BY MESSENGER

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station
Boston, MA 02110

     Re: Docket No. 99-271

Dear Ms. Cottrell:

     I write on behalf of AT&T Communications of New England, Inc., ("AT&T") with a brief response to a letter from Bell Atlantic-Massachusetts ("BA-MA") dated June 7, 2000, regarding the issue of LSOG 4 volume testing.

     BA-MA writes that its new Request Manager software is a "middleware or gateway application" rather than a "front-end system." This wordplay cannot obscure the fundamental point of AT&T's request for reconsideration: volume testing of LSOG 2/3 will not subject the LSOG 4 systems to appropriate volume testing, because in LSOG 4 the old DCAS has been replaced with Request Manager.

     In discussing complex computer systems like BA-MA's Operations Support Systems, one typically distinguishes between "front-end" and "back-end" systems. There can be no doubt that that DCAS and Request Manager are part of the front-end systems that accept and route orders and pre-order inquiries, not part of the back-end systems that do the substantive processing of any orders. BA-MA's use of different nomenclature simply divides its front-end OSSs into two sub-categories: front-end applications which first receive a CLEC order, and its key gateway system that screens and routes the orders. Despite BA-MA's use of wordplay to pretend that AT&T made a mis-statement in our letter of June 2, 2000, the fact is that BA-MA concedes – as it must – that Request Manager is the key part of the LSOG 4 "gateway systems" and performs order validation, determines whether an order is a candidate for flow-through processing, and routes each order to the proper systems destination for further processing. This is what AT&T said in our letter, and this remains undisputed.

     Volume testing by KPMG will not merely test the capacity of EDI, the Web GUI, or CORBA. It will also test the capacity of the other part of the front-end systems, which BA-MA prefers to call "middleware or gateway systems." Volume testing of LSOG 2/3 will not tell the Department anything about the ability of Request Manager to handle commercial volumes in conjunction with the other LSOG 4 systems. BA-MA tries to

obscure this key point in its June 7 letter, but it does not and cannot dispute this key point.

In short, as explained in our letter of June 2, 2000, Bell Atlantic's assertion that volume testing of the LSOG 2/3 systems will be fully applicable to LSOG 4 is simply not correct. The basis for the Department's decision on LSOG 4 volume testing, as stated in the May 12 Letter Order, therefore appears to have been the result of mistake or inadvertence. For this reason, AT&T respectfully requests that the Department reconsider its prior determination and direct KPMG to conduct full volume and stress testing of Bell Atlantic's LSOG 4 OSSs.

Very truly yours,

Kenneth W. Salinger

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